

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

V.

TERRELL REID,

Defendant.

Cause No. 4:19-CR-00327-RWS

RESPONSE TO ORDER TO SHOW CAUSE

Comes now undersigned counsel, and responds to the Order to Show Cause as follows:

1. This Court entered an Order to Show Cause as to why this Court should not sanction undersigned counsel for failing to appear and call into the telephone conference scheduled for today, July 2, 2020. (Doc. #162)

2. Undersigned counsel was preparing for a jury trial that is scheduled for July 8, 2020 in the Southeastern Division of this District, the Honorable Judge Limbaugh presiding.

3. Undersigned counsel was reviewing newly disclosed discovery and received a call from the Assistant United States Attorney representing the Government at the impending trial and undersigned counsel lost track of time.

4. Undersigned counsel was checking her email before travelling to the Ste. Genevieve County Jail and saw notice of entry of Document #162, and responds to this Court's Order quickly as possible.

5. Undersigned counsel and Mr. Adler are scheduled to meet with Defendant tomorrow, July 3, 2020, to discuss the Evidentiary Hearing scheduled for July 16, 2020, Honorable Judge Baker presiding.

6. Undersigned counsel will make herself available at the Court's convenience and apologizes for wasting the Court's, and others', time and resources.

WHEREFORE, undersigned counsel respectfully requests this Court not impose sanctions and to reset the scheduling conference.

MUHLENKAMP & BERNSEN,
ATTORNEYS AT LAW, LLC

By: /s/ Tory D. Bernsen
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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2020, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Assistant United States Attorney
111 South 10th Street, 20th Floor
St. Louis, MO 63102

/s/ Tory D. Bernsen